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Department of Energy

Richland Operations Office
P.O. Box 550
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SEP 30 1994

94-RSD-027

Mr. David Lundstrom, Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. 4th Avenue
Kennewick, Washington 99336

Dear Mr. Lundstrom:

REQUEST TO REVISE HANFORD FACILITY PART A, FORM 3 FOR 100-D PONDS

This is in response to your letter to J. E. Rasmussen and J. F. Nemec, "Hanford Facility Part A, Form 3 for the 100-D Ponds (D-1-1, M-20-40)," dated August 25, 1994. The letter requested that the Hanford Facility Part A, Form 3 for the 100-D Ponds be revised to include pipes that formerly carried waste to that surface impoundment. Both the surface impoundment and the piping are located within the 100-DR-1 Operable Unit (OU), which is undergoing remediation with the State of Washington Department of Ecology (Ecology) as the lead regulatory agency. 38565 ✓

The 100-D Ponds are being proposed for remediation and closure pursuant to the 100-D Ponds Closure Plan. All other waste sites within the 100-DR-1 OU, including process effluent pipelines, are being proposed for remediation in the 100-DR-1 Operable Unit Focused Feasibility Study Report (DOE/RL-94-64, Draft A), and Proposed Plan for Interim Remedial Measures at the 100-DR-1 OU, (DOE/RL-94-100, Draft A) which were submitted to you on September 30, 1994. 38640
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The 100-D Area process sewer system is quite extensive and only parts of the system have had contact with potentially dangerous waste that went to the 100-D Ponds. In keeping with the Hanford Facility Agreement and Consent Order and the Hanford Site Past Practice Strategy, it was decided to deal with the process sewer system as a whole. The 100-DR-1 Proposed Plan is the most appropriate and efficient mechanism for remediation of the 100-D Area process sewer.

In the letter of August 25, 1994, Ecology stated that piping, which formerly served the 100-D-Ponds surface impoundment, should be included in the Part A for that surface impoundment because the piping is "ancillary equipment." However, the definition of ancillary equipment found in WAC 173-303-040 applies only to tank systems, and not to surface impoundments. Since the 100-D Ponds are a surface impoundment, there is no regulatory requirement to include the process effluent pipelines in the Part A for the 100-D Ponds. Instead, the pipelines can be remediated more appropriately as a waste unit within the 100-DR-1 OU.

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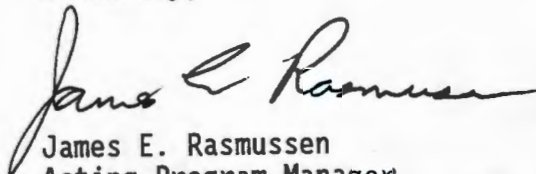
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Should you have any questions or require additional information, please contact Ms. Nancy Werdel on 376-5500.

Sincerely,



James E. Rasmussen
Acting Program Manager
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Permits and Policy

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Administrative Records, H6-08

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